UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA



INDICTMENT FOR THEFT OF GOVERNMENT FUNDS

UNITED STATES OF AMERICA * CRIMINAL DOCKET NO.

v. * SECTION:

PEARL DILEO * VIOLATIONS: 18 U.S.C. § 641

* * *

The Grand Jury charges that:

COUNT 1

A. AT ALL MATERIAL TIMES HEREIN:

- 1. Prior to August and September of 2005 and through the present, the defendant **PEARL DILEO**, resided at and used as her primary residence a home located at 7400 St. Charles Ave., New

 Orleans, Louisiana 70118, in the Eastern District of Louisiana.
- 2. Prior to August and September 2005, the defendant, **PEARL DILEO**, also owned a residence located at 2820 South Street, Mandeville, Louisiana 70448, in the Eastern District of Louisiana.
 - 3. Hurricane Katrina made landfall in Louisiana on August 29, 2005, and caused widespread

damage to the Gulf Coast region of Louisiana, including the New Orleans, Louisiana and Mandeville, Louisiana areas.

- 4. Pursuant to legislation passed by the Congress of the United States of America and signed by the President of the United States, funds were appropriated to the Department of Housing and Urban Development ("HUD") for a Community Development Block Grant ("CDBG") for Louisiana hurricane victims. The purpose of this CDBG was to assist and aid owners of property damaged or destroyed by Hurricanes Katrina and Rita in August and September of 2005. The grant money was disbursed under a program known as the Louisiana Road Home Program ("LRHP"). HUD prepared the rules and regulations governing the disbursement of grant money through the State of Louisiana. The State of Louisiana, through the Office of Community Development, Division of Administration, contracted with ICF International, Inc. to administer the LRHP.
- 5. One of the major requirements for receiving grant money from the LRHP was the damaged property be the primary residence of the applicant on August 29, 2005.

B. THE OFFENSE OF THEFT OF GOVERNMENT FUNDS

6. From on or about October 24, 2006 to on or about August 4, 2008, in the Eastern District of Louisiana, the defendant, **PEARL DILEO**, did knowingly steal, purloin, and convert for her own use funds and money of the United States Department of Housing and Urban Development, a department and agency of the United States, namely, Community Development Block Grant funds provided through the Louisiana Road Home Program to which she knew she was not entitled, having

a value of approximately \$149,925.00; all in violation of Title 18, United States Code, Section 641.

| | A TRUE BILL: |
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| - M | FOREPERSON |

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New Orleans, Louisiana January 23, 2009